

MISCELLANEOUS CASE COVER SHEET

PLAINTIFFS

HUZHOU CHUANGTAI RONGYUAN INVESTMENT MANAGEMENT
PARTNERSHIP, HUZHOUI HUIHENG YING EQUITY INVESTMENT
PARTNERSHIP, and HUZHOUI HUIRONGSHENG EQUITY INVESTMENT
PARTNERSHIP

Attorney's (Firm Name, Address, and Telephone Number)

Pillsbury Winthrop Shaw Pittman LLP
31 West 52nd Street, New York, New York 10019 Tel: (212) 858-1000
Fax: (212) 858-1500

DEFENDANTS

See attached rider

Attorneys (If Known)

DESCRIPTION OF CASE

Complaint against Judgment Debtor and his co-conspirators asserting Civil RICO and related causes of action against Racketeering Enterprise to disregard or unwind Debtor's sham transactions and his creation of sham entities, and assess liability on his alter egos and conspirators.

Has this or a similar case been previously filed in SDNY ?

No? ☐ Yes? ☒ Judge Previously Assigned The Honorable Katherine Polk Failla

If yes, was this case: Vol. ☐ Invol. ☐ Dismissed. No ☒ Yes ☐

If yes, give date: _____ & Case No. _____

NATURE OF CASE M98

- ☐ M 08-85 Motion to Compel
- ☐ M 08-85 Motion to Quash
- ☐ M 08-86 Internet Infringement
- ☐ M 08-88 Surety Companies
- ☐ M 08-425 Sureties Proceedings
- ☐ M 11-03 SEC Litigation to Freeze Account
- ☐ M 11-188 GJ Subpoenas - Unsealed
- ☐ M 11-189 GJ Subpoenas - Sealed
- ☐ M 16-88 Sale of Unclaimed Seamen's' Effects
- ☐ M 18-66 Forfeiture Proceedings - Funds Held in trust. 28 USC 1746
- ☐ M 18-302 Registration of a Judgment from Another District
- ☐ M 18-304 Administrative Subpoena Proceedings
- ☐ M 18-305 Registration of Student Loan Judgment
- ☐ M 18-981 Nonjudicial Civil Forfeiture Proceeding
- ☐ M 19-25 Order Authorizing IRS Officer to Enter Premises for Levy
- ☐ M 19-58 General Bonds in Admiralty Purs. to Local Admiralty Rule 8
- ☐ M 19-63 Receivers - Property In Other Districts
- ☐ M 19-78 Denial to Sue In Forma Pauperis
- ☐ M 22-1 Designation by U.S. Attorney of Individual to accept service of summons and complaint
- ☐ M 22-2 Designation of individual to issue certified copies in bankruptcy part
- ☐ M 23 Petition to Perpetuate Testimony
- ☐ M 25-1 Order for Entry to Effect Levy - IRS Matter
- ☐ M 25-2 Permission to have access to safe deposit boxes
- ☐ M 26-1 Proceeding to Enforce Order of Administrator - National Credit Union
- ☐ M 26-2 Application to Enforce Administrative Order Rule 5A Rule of Division of Business among District Judges
- ☐ M 28 Warrant for Entry & Inspection of Premises
- ☐ M 29 Privacy Act Application
- ☐ M 30 Privacy Act Application
- ☐ M 31 Order of Commodity Exchange Commission Directing Person to Pay Money
- ☐ M 32 Petition for Writ to Produce Federal Prisoner in State Court
- ☐ M 33 Inspection Warrant - Department of Energy
- ☐ M 34 Order of Another District Court that the State Court Produce
- ☐ M 35 Order to Stay Transfer of Federal Prisoner
- ☐ M 36 National Labor Relations Board

- ☐ M 37 Application to Re-Open Civil Case(s) that are more than 25 years old
- ☐ M 38 Application for Reassignment of Bankruptcy Proceeding
- ☐ M 39 Application for Discovery and Inspection of Defendant Detained in Federal Prison
- ☐ M 41 Order of Return of 28:2254/2255 Petition
- ☐ M 42 Order Denying Stay of Deportation
- ☐ M 43 Contempt of Court in Bankruptcy
- ☐ M 44 Claim Compensation under Longshoremen & Harbor Workers Compensation Act
- ☐ M 46 Order from Another District for Public Viewing
- ☐ M 47 Bankruptcy Cases - Before Appeal Filed
- ☐ M 47B Transmission of Proposed Findings of Fact and Conclusions of Law
- ☐ M 48 Application for Appointment of Counsel - No Case in This Court
- ☐ M 49 Order Denying Commencement of Civil Action
- ☐ M 51 Order to Show Cause - Case Being Transferred from Northern District of New York
- ☐ M 52 Application for Leave to File a Complaint
- ☐ M 53 Order Barring Individual from Entering Courthouse Building
- ☐ M 54 Immigration Naturalization - Order Delaying Deportation
- ☐ M 55 Petition for Appointment of Impartial Umpire - Labor Management Relations Act and Others
- ☐ M 58 Application for Extension of Time to File Petition for Removal
- ☐ M 59 Application to Produce Federal Prisoner in State Court
- ☐ M 67 Notice of Eviction to Squatters (USA Cases)
- ☐ M 71 Application re: Federal Rules Cr. 11(e)(2)
- ☐ M 72 Order of Attachment of Another District - EDNY
- ☐ M 73 Subpoena to Government Agency
- ☐ M 75 Application for Writ of Garnishment
- ☐ M 76 Central Violations Bureau
- ☐ M 77 Application to have subpoena issued to person living in this district regarding action in foreign country or tribunal
- ☐ M 90 Order of Attachment
- ☐ M 93 Letters Rogatory _____
- ☐ M 94 Other _____
- ☒ M 98 Application to file a civil case under seal.
- ☐ M 100 Motion to unseal - Criminal Duty Matter

DO YOU CLAIM THIS CASE IS RELATED TO A MISCELLANEOUS CASE NOW PENDING IN THE SDNY? IF SO, STATE:

JUDGE The Honorable Katherine Polk Failla

MISCELLANEOUS CASE NUMBER

21 Civ. 9221 (KPF)

NOTE: Please submit at the time of filing an explanation of why cases are deemed related Please see attached rider

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

HUZHOU CHUANGTAI RONGYUAN INVESTMENT MANAGEMENT PARTNERSHIP, HUZHOU HUIHENG YING EQUITY INVESTMENT PARTNERSHIP, and
HUZHOU HUIRONGSHENG EQUITY INVESTMENT PARTNERSHIP

Floor 29, Tower 1, Poly International Plaza, Building 19, District 7, Wangjing Dongyuan, Chaoyang District, Beijing, China

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

see attached rider

DEFENDANT(S) ADDRESS UNKNOWN

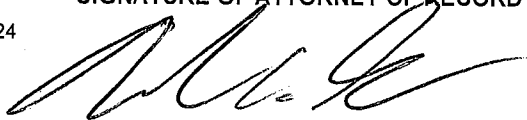
REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

N/A

CHECK ONE: AT LEAST ONE PARTY IS PRO SE No ☒ Yes ☐

CHECK ONE: THIS ACTION SHOULD BE ASSIGNED TO WHITE PLAINS ☐ MANHATTAN ☒

DATE 03/18/2024 SIGNATURE OF ATTORNEY OF RECORD



ADMITTED TO PRACTICE IN THIS DISTRICT

☐ U.S. GOVERNMENT ATTORNEY

☐ NO

☒ YES (DATE ADMITTED MO. Nov. YR. 2003)

ATTORNEY BAR CODE # AS2846

RECEIPT #

Ruby J. Krajick, Clerk of Court, _____

Date 03/18/2024

Defendants:

Judgment-Debtor HUI QIN (a/k/a MUK LAM LI, LI MUK LAM, HUI HUI QIN, KARL QIN, HUI QUIN), DUO LIU (a/k/a EMMA LIU), XUEMIN LIU, RUOLEI LIU, XUEYUAN HAN (a/k/a HANK HAN), HANGYUAN ZHANG, BRYN MAWR TRUST COMPANY OF DELAWARE, TRIDENT TRUST COMPANY, ST. TOME LLC, ST. FORTUNE GROUP LLC, LUXURY TEAM, INC., ST. GRAND CEREMONY LLC, KING FAME TRADING (BVI), PH2003 UNIT LLC, APPLGREEN LLC, LUBAN CONSTRUCTION INC., ST HUDSON GROUP LLC, GOLDEN PEGASUS LLC, GOLDEN LITTLE ELEPHANT INC., GOLDEN KIRIN LLC, HARUSHIO LLC, GOLDEN LITTLE DRAGON, GOLDEN MERMAID LLC, HATAKAZE LLC, QYNM FAMILY HOLDING LLC, HS-QYNM FAMILY, INC. QIN FAMILY TRUST, I LOVE GLE TRUST, APPLGREEN FAMILY TRUST, MASTERPIECE HOLDING GROUP LTD., NEW LAND CAPITAL LLC, YOUYORK MANAGEMENT LLC, GOLDEN LAND FUNDS LLC, MAXIM CREDIT GROUP LLC, HFRE LLC, JOHN AND JANE DOES 1-20.

Defendants' Addresses and Counties:

1. Hui Qin ("Qin") (a/k/a Muk Lam Li, Li Muk Lam, Hui Hui Qin, Karl Qin, Hui Quin), MDC Brooklyn, Metropolitan Detention Center, P.O. Box 329002, Brooklyn, New York 11232, Kings County.
2. Duo Liu (a/k/a Emma Liu), 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
3. Xuemin Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
4. Ruolei Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.

5. Xueyuan Han, (a/k/a Hank Han), 377 Rector Place, New York, NY, 10280, New York County.
6. Hangyuan Zhang, 4026 College Point Blvd Apt 9d, Flushing, NY 11354-5127, Queens County.
7. St. Tome LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
8. St. Fortune Group, LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
9. Luxury Team, Inc., ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
10. St. Grand Ceremony LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
11. St. Hudson Group LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
12. King Fame Trading Limited, ATTN: Xuemin Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
13. Applegreen LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
14. Luban Construction Inc., ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
15. Golden Little Elephant Inc., ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.

16. Golden Little Dragon LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
17. Golden Mermaid LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
18. Golden Pegasus LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
19. Golden Kirin LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
20. Harushio LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
21. Hatakaze LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
22. HFRE LLC, ATTN: Xueyuan (Hank) Han, 377 Rector Place, New York, NY, 10280, New York County.
23. QYNM Family Holding, LLC, ATTN: Xueyuan (Hank) Han, 377 Rector Place, New York, NY, 10280, New York County.
24. PH2003 Unit LLC, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
25. YouYork Management LLC, 109 Madsen Ave, Staten Island, NY, United States, 10309, Richmond County.
26. New Land Capital LLC, ATTN: Hangyuan Zhang, 60 E 42nd St, Ste 2140, New York, NY, 10165, New York County.

27. Golden Land Funds Inc., ATTN: Hangyuan Zhang 60 E 42nd St, Ste 2140, New York, NY, 10165, New York County.
28. Maxim Credit Group LLC, 660 Madison Avenue, Suite 1700, New York, NY, United States, 10065, New York County.
29. Bryn Mawr Trust Company of Delaware, 20 Montchanin Road - Suite 100, Greenville, DE 19807, New Castle County.
30. Trident Trust Company (South Dakota), 300 Cherapa Place, Suite 501 Sioux Falls, South Dakota 57103, Minnehaha County.
31. HS-QYNM Family, Inc., ATTN: Xueyuan (Hank) Han, 377 Rector Place, New York, NY, 10280, New York County.
32. Qin Family Trust, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
33. I Love GLE Trust, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
34. Applegreen Family Trust, ATTN: Duo (Emma) Liu, 39 Applegreen Dr, Old Westbury, NY 11568, Nassau County.
35. Masterpiece Holding Group Ltd., Jigsaw House 3-4 The Oaks, Stanney Mill Lane, Chester, United Kingdom CH2 4HY, 96090.

Statement of Related Case:

1. Plaintiffs commenced the S.D.N.Y. Case No. 1:21-cv-09221-KPF (the “Related Case”) for the purpose of confirming and enforcing an arbitral award against Hui Qin. The Court confirmed the arbitral award and ordered money damages in favor of Plaintiffs.
2. Through post-judgment discovery in the Related Case, Plaintiffs discovered that Qin and various co-conspirators had engaged in a fraudulent scheme to hide and transfer Qin’s assets to avoid his payment obligations to Plaintiffs in the underlying dispute that gave rise to the arbitration, and to avoid Plaintiffs’ collection of the Judgment.
3. Plaintiffs bring this action against Qin, his affiliates and other transferees to disregard or unwind Qin’s sham transactions and his creation of sham entities, assess liability on his alter egos and conspirators, and prevent Qin’s assets from moving further.
4. The Complaint contains and relies on key evidence discovered through post-judgment discovery in the Related Case and relies in depth on the factual background and prior rulings of the District Court in the Related Case.